

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of §  
§  
Amendment of Part 22 of the Commission's §  
Rules to enable a cellular telephone user §  
effective and reliable access to 911 service §

CC Docket No. 94-102

FEDERAL

OFFICE OF

COMMUNICATIONS

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**COMMENTS OF  
SOUTHWESTERN BELL MOBILE SYSTEMS, INC.  
ON AD HOC ALLIANCE'S PETITION FOR RULEMAKING**

Southwestern Bell Mobile Systems, Inc. (SBMS) files the following comments in response to the Petition for Rulemaking filed by the Ad Hoc Alliance for Public Access to 911 (Ad Hoc).<sup>1</sup> Cellular telephone users today have effective and reliable access to 911 service where the public service entities offer 911 service. As discussed in SBMS' comments in this initial rulemaking, the cellular industry has long supported 911 services and has worked with local municipalities and public safety organizations to assure that cellular users have access to 911 type emergency services.<sup>2</sup>

The Commission made a wise decision in including the two proposals in the wireless 911 docket already pending at the Commission.<sup>3</sup> As with the other 911 issues in this docket, the two proposals must be examined by reviewing how the industry currently operates, the benefit to be derived from such proposal and the anticipated cost of such proposal on wireless services.

<sup>1</sup>Petition for Rulemaking of the Ad Hoc Alliance for Public Access to 911, filed October 27, 1995 (PFR). (Public Notice, Issued November 13, 1995) (Public Notice).

<sup>2</sup>See, Comments of SBC Communications, Inc., CC Docket No. 94-102, (Filed January 9, 1995) (SBC Initial 911 Comments), pp. 1-5.

<sup>3</sup>See, Public Notice; See Also, In the Matter of the Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102; RM-8143, Notice of Proposed Rulemaking (Released October 19, 1994).

## **I. Cellular Carriers Today Provide Reasonable and Appropriate Access to 911 Services.**

Ad Hoc suggests that the Commission adopt a rule that requires cellular carriers to "Render priority, unrestricted and unconditional access to 911 emergency services from all mobile stations without regard to subscription or nonsubscription status".<sup>4</sup> Ad Hoc does not discuss the technical feasibility of such an obligation but rather merely claims that such an obligation is a "reasonable and appropriate obligation."<sup>5</sup> Ad Hoc's proposed rule change, as written, is neither reasonable nor appropriate. The proposal is unreasonable because as discussed in the initial comments in this docket, it is not technically and economically feasible to provide "priority" access to wireless 911 calls.<sup>6</sup> This matter has been fully briefed in the initial portion of this docket and Ad Hoc offers no new evidence on the issue. Further, it is unclear what is meant by the terms "unrestricted and unconditional". For example, the rule fails to take into account the fact that 911 service itself may not be available in all areas or whether there is a public safety answering point willing to take calls from wireless phones.<sup>7</sup>

SBMS' concerns regarding the language proposed by Ad Hoc however, does not reflect a disagreement with the Ad Hoc's concern. SBMS notes that the issue of 911 availability criteria was raised<sup>8</sup> and fully briefed in the initial stage of this docket. SBMS' systems today will

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<sup>4</sup>PFR, p. 5.

<sup>5</sup>Id.

<sup>6</sup>SBC Initial 911 Comments, p. 10; NYNEX Comments (CC Docket No. 94-102), pp. 12-13; Cellular Telecommunications Industry Association Comments (CC Docket No. 94-102), pp. 13-14. (CTIA Initial 911 Comments)

<sup>7</sup>See, SBC Initial 911 Comments, pp. 5-7; CTIA Initial 911 Comments, pp. 4-5.

<sup>8</sup>See, Initial 911 NPRM, para. 41.

process 911 calls, air-time free, in areas where 911 service is available and a public service answering point will accept such calls, regardless of whether the call is from a cellular mobile unit subscribed to our system or a foreign system and regardless of whether there is any roaming agreement between SBMS and the foreign system. Thus, the concern of Ad Hoc that "Denial of service occurs when the carrier's cellular telephone system is programmed to block 911 calls from transient or nonsystem subscribers" simply does not occur on SBMS' systems today if there is 911 service available in the area and there is a public service answering point willing to take the calls. Of course, incompatibility of technologies (i.e. P.C.S. vs. Cellular) is an issue. However, compatibility is an issue to be resolved via the mobile transmitter, i.e. through dual band phones, which are currently being designed.

## **II. Concerns Regarding Ad Hoc's Proposal Requiring a Change in the Specification for Cellular Telephones**

Ad Hoc proposes to require new cellular telephone manufacturers to build intelligence into the phones so that if a customer dials 911 the phone will examine the signal strength of all control channels assigned to both the A system and B system and then select the channel with the strongest signal.<sup>9</sup> SBMS notes that currently most cellular telephones may be set to scan both systems. Thus, it is questionable whether such a rule specific to 911 calls should be required.

Ad Hoc states that the cost would be trivial to cellular telephone equipment manufacturers, however there is no data to support such a statement in Ad Hoc's proposal. The fact that no equipment manufacturer has offered such a 911 specific feature on its phones to date may indicate that the cost is not trivial. The absence may also indicate that the ability to set the phone to scan both systems today satisfies the public's desire for such a feature. Quite simply the need for such

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<sup>9</sup>PFR, pp. 6-7.

a feature must be weighed against the cost, taking into account the fact that most phones today are capable of scanning both A and B and that most systems have completed their five year buildout period and thus are fully functional. Seemingly, Ad Hoc's concern is addressed by equipment available today.


### **Conclusion**

For the reasons stated herein SBMS proposes that the Commission not adopt Ad Hoc's proposed language changes to Part 22 paragraph 22.911 (b). The Commission should also evaluate the Ad Hoc's equipment proposal carefully to determine whether the added cost of such a mandated feature justifies the added benefit, taking into account that the "scan both systems" feature is available today.

Respectfully submitted,

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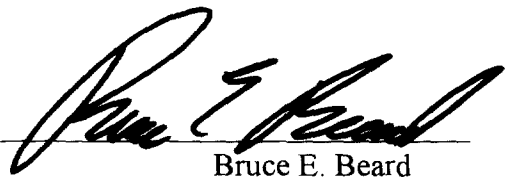
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